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July 24, 2025

SUBMITTED VIA E-FILE

The Honorable Leonard P. Stark
U.S. Court of Appeals for the Federal Circuit
717 Madison Place, NW
Washington, D.C. 20439

Re: *Crystallex International Corp. v. Bolivarian Republic of Venezuela*,
D. Del. C.A. No. 1:17-mc-00151-LPS

Dear Judge Stark:

I write on behalf of PDV Holding, Inc. (“PDVH”) and CITGO Petroleum Corporation (“CITGO”) regarding the sealed Memorandum of Law in Support of Notice of Objections to Special Master’s Final Recommendation (the “Memorandum”) and its accompanying exhibits, submitted contemporaneously to the Court today. Pursuant to the Court’s July 14 Order, CITGO and PDVH have consulted with the Special Master and are also contemporaneously filing a redacted version of the same. D.I. 1887. CITGO and PDVH submit this letter to explain the basis for its redactions to the Memorandum.

In all but one instance, the redacted portions of the Memorandum and exhibits, including those exhibits withheld in their entirety, reflect requests from the Special Master and his counsel—not any of the Venezuela Parties. Pursuant to this Court’s July 14 Order, CITGO and PDVH conferred with the Special Master in advance of filing regarding his position on the confidentiality of material in these filings. D.I. 1887. The Special Master’s counsel provided guidance on what information should be withheld from public filing, and CITGO and PDVH have “compl[ie]d” with the Special Master’s directives regarding the same. *Id.* Broadly speaking, they are intended to redact bidder identities, bid amounts, and correspondence about the sale process produced in discovery or otherwise exchanged with Sale Process Parties that have not otherwise been publicly filed. CITGO and PDVH take no position on whether such categories of redacted information should remain confidential at this time but assume and believe it would be appropriate for such information to be public at the Sale Hearing absent a compelling justification given the

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presumption of access to such proceedings and the extent to which maintaining information about the sale process under seal would interfere with the ability to hold a public hearing.

Redactions in the expert report of Dr. José Alberro cover CITGO and/or PDVH's highly confidential and competitively sensitive financial or business information.

Consistent with the Court's July 14 Order and directives from the Special Master, CITGO and PDVH have served unredacted versions of today's filings on parties to this case that have executed the confidentiality agreement at D.I. 1555-1.

Respectfully,

/s/ Alexandra M. Cumings

Alexandra Cumings (#6146)

cc: All Counsel of Record